

IN RE:

**SALVATORE J. CATALANO, 2ND
SUSAN E. CATALANO CASE NO.
Debtors.**

**SALVATORE J. CATALANO, 2ND
SUSAN E. CATALNO
Debtors.**

VS.

**JPMORGAN CHASE BANK, N.A., as
servicer for Wilmington Trust Company, as
successor to U.S. Bank, N.A., as Trustee for
MASTR Alternative Loan Trust 2004-7
Respondent(s)**

VS.

CHARLES DEHART, III
Standing Chapter 13 Trustee
Respondents(s)

CHAPTER 13

5-14-bk-04282 RNO

**MOTION TO SELL REAL
PROPERTY “37 N. GREEN ST.
E. STROUDSBURG, PA 18301”**

**MOTION TO SELL REAL PROPERTY LOCATED AT 37 N. GREEN ST.
EAST STROUDSBURG, PA 18301**

And Now Come the movant/debtors, Salvatore, J. Catalano, 2nd and Susan E. Catalano, and hereby request that this Honorable Court allow debtors to sell real property of their Chapter 13 bankruptcy estate located at 37 N. Green St. East Stroudsburg, PA 18301. In support of this motion, debtors, aver as follows:

1. Debtors filed a voluntary petition under Chapter 13 of the U.S. Bankruptcy Code on September 16, 2014.

2. Debtors reorganization plan confirmed by this Court Order of 6/28/17 **Docket # 213** called for the liquidation of real property located at 37 N. Green St. East Stroudsburg, PA 18301 (See attached Exhibit 1)
3. Debtors have complied with the sale requirements and request that this Court grant debtors' permission to sell 37 N. Green St. East Stroudsburg, PA 18301.
4. This sale will be conditional on debtors' satisfying JP Morgan Chase (respondent's herein) mortgage lien by paying the balance at settlement. (See attached Exhibit "2")
5. The net proceeds of this sale will be paid to Charles DeHart, III – Standing Chapter 13 Trustee and be distributed in accordance with the approved plan.

WHEREFORE, debtors request that this Honorable Court approve the sale of 37 N. Green St. East Stroudsburg, PA 18301.

Respectfully submitted this 10th day of May 2019



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